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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

ANTHONY WRIGHT, individually;)	CASE NO.: 5:25-cv-917 SSS
NICOYA WRIGHT, individually and)		
as Guardian Ad Litem of L.W., a)		
minor; L.W., individually;)	Joint Rule 26(f) Report
)	Scheduling Conference:
Plaintiffs,)	Date: October 10, 2025
)	Time: 1:00 p.m.
v.)	Held via Zoom videoconference
SAN BERNARDINO COUNTY		
SHERIFF's DEPARTMENT, et. al.,		
Defendants.		

1 The parties have duly conferred regarding a discovery schedule in this case. The
2 parties hereby submit this Joint Rule 26(f) Report:

- 3 1. The Court has ordered a virtual Scheduling Conference to take place on
4 October 10, 2025, at 1 p.m. ECF 23.
- 5 2. Statement of the Case: This case arises out of an incident at the Glen Helen
6 Rehabilitation Center (GHRC) in San Bernardino, California, where Mr.
7 Anthony Wright was a pre-trial detainee. The Complaint was filed on April
8 15, 2025. Mr. Wright alleges that he fainted due to unconstitutional conditions
9 and policies at the GHRC, was subsequently subject to excessive force by a
10 GHRC guard, and did not receive adequate medical care. As a result of this
11 incident, Mr. Wright is now paralyzed from the neck down and unable to
12 move any of his limbs. He brings section 1983 claims against San Bernardino
13 County, the guard who used force upon him, the guards who failed to protect
14 and intervene, and the sheriff and warden who are subject to supervisory
15 liability. Mr. Wright's wife, Nicoya Wright, and children, A.G., H.W., a L.W.,
16 also bring Fourteenth Amendment claims for interference with the
17 parent/child relationship. Mr. Wright has also brought state claims. Plaintiffs
18 do not know the identity of all the guards involved and have sued them as
19 John Does. Plaintiffs will move to amend the complaint once all the defendant
20 guards have been identified.
- 21 3. Defendants answered Plaintiffs' Complaint on August 5, 2025. Defendants
22 deny that they violated Plaintiffs' rights or state law and have asserted eleven
23 affirmative defenses, including qualified immunity.
- 24 4. Subject Matter Jurisdiction: This action is brought pursuant to 42 U.S.C. §§
25 1983 and 1988, and the Fourth and Fourteenth Amendments to the United
26 States Constitution, and the laws and Constitution of the State of California.
27 Jurisdiction is conferred upon this Court by 28 U.S.C. §§ 1331 and 1343.
28 Venue is proper within the Central District of California pursuant to 28 U.S.C.

§ 1391(b)(2) because the events upon which Plaintiffs base their claims occurred within this district.

5. Legal Issues: Plaintiffs have brought these claims pursuant to the Fourth and Fourteenth Amendments as well as California state law. Plaintiffs allege excessive force, failure to protect from harm, failure to intervene, supervisory liability, unconstitutional conditions of confinement, and negligence. Defendants assert qualified immunity as a defense. Defendants also contend that Plaintiffs' state-law claims are barred by their failure to comply with the California Government Claims Act.

6. Parties and Evidence:

a. Parties: Anthony Wright, Nicoya Wright, A.W., L.W., A.G., San Bernardino County, Shannon Dicus, James Williams, and John Doe Defendants who have yet to be identified.

b. Percipient witnesses: It is difficult to identify with accuracy the full scope of the parties' witness lists at this early stage of discovery. Plaintiffs expect to depose corporate designees for San Bernardino County, Mr. Wright's medical treaters, staff who are knowledgeable about the policies and practices at GHRC that are relevant to Plaintiffs' *Monell* allegations, and any guards, nurses, detainees, or other individuals who witnessed the subject incident. Details regarding these witnesses are expected to become more clear upon the parties' exchange of discovery.

c. Key Documents: Plaintiffs expect to request and receive documents related to the subject incident such as investigative reports, disciplinary documents, audio or video files, and interview records; policies, procedures, and other documents reflecting practices and customs at GHRC which relate to the *Monell* allegations; training records; personnel records; and medical records.

1 d. Subsidiaries, parents, and affiliates: The only entity party to this case,
2 San Bernardino County, does not have any subsidiary, parent, or
3 affiliate relevant to this case.

4 7. Service of Complaint: Each named Defendant has been served, but Plaintiffs
5 will need to amend the Complaint once the John Doe Defendants are
6 identified, and those Defendants will need to be subsequently served.

7 8. Damages: Damages are difficult to quantify at this time. Mr. Wright, however,
8 is paralyzed below the neck and unable to use any of his limbs. Accordingly,
9 Mr. Wright's claimed damages are significant. Plaintiffs anticipate extensive
10 discovery is needed regarding extent of Mr. Wright's complex medical
11 injuries.

12 9. Insurance: Defendant San Bernardino County is self-insured, with excess
13 liability coverage through PRISM (Public Risk Innovation, Solutions, and
14 Management), a joint powers authority.

15 10. Motions: Plaintiffs anticipate amending their Complaint to substitute the true
16 names of Defendants presently named as John Doe Defendants once the true
17 identities of those individuals are discovered. The parties anticipate being able
18 to stipulate to leave to file such an amendment. No motions to transfer venue
19 or to challenge the Court's jurisdiction are anticipated.

20 11. Dispositive Motions: Depending on the results of discovery, Defendants may
21 move for summary judgment or partial summary judgment. The particular
22 issues or claims that may be at issue in such a motion cannot yet be determined
23 at this early stage of the case, other than that Defendants contend Plaintiffs'
24 state-law claims for relief are barred by their failure to comply with the
25 California Government Claims Act.

26 12. Manual for Complex Litigation: The parties do not expect the Manual for
27 Complex Litigation to be applicable here.
28

1 13.Status of Discovery: Defendants answered Plaintiffs' Complaint on August 5,
2 2025. Even prior to that filing, Defendants informally produced documents
3 Plaintiffs had requested to help Plaintiffs begin to identify John Doe
4 Defendants. Formal discovery has not yet commenced, but the parties have
5 agreed to exchange formal Initial Disclosures by September 30, 2025. After
6 evaluating those Disclosures, the parties will commence formal written
7 discovery, followed by depositions.

8 14.Discovery Plan: No changes in the disclosures under Rule 26(a) should be
9 made, other than the scheduling of expert and pretrial disclosures, which should
10 be on the schedule set in the Scheduling Order and the Local Rules instead of
11 the default dates in Rule 26(a)(2) and (a)(3). Plaintiffs will need to obtain
12 discovery on the incident which caused Mr. Wright to be injured, the identities
13 of the John Doe Defendants and the individuals who witnessed the incident,
14 the policies, conditions, and widespread practices attendant to the incident,
15 and damages.

16 15.The Parties disagree regarding whether fact discovery should be conducted in
17 phases. Defendants contend that fact discovery should be conducted in two
18 phases, focusing first on the facts and circumstances of Plaintiffs' own
19 claimed injuries and whether Defendants deprived them of their constitutional
20 rights, before conducting discovery into unrelated incidents for purposes of
21 establishing Monell liability. Plaintiffs, on the other hand, contend that all
22 such Monell discovery should be conducted concurrently with discovery into
23 what happened specifically to Plaintiff Wright. The parties agree, however,
24 that formal briefing on this issue is necessary rather than attempting to address
25 it within this Joint Report, and ask the Court to set a briefing schedule on the
26 question.

27 16.In addition, Plaintiffs contend that an expansion of the 10-deposition limit
28 under Federal Rule of Civil Procedure 30 is needed due to the anticipated

1 complexity of *Monell* issues in this case as well the number of people who
2 may have witnessed the incident. It is Plaintiff's understanding that 60-80
3 people were on the yard during the incident, and it is unknown at this time
4 how many individuals witnessed it. While Defendants are open to the
5 possibility of a need for additional depositions, they do not agree at this time
6 to a three-fold expansion of the number of permitted depositions. Instead,
7 Defendants propose that depositions be limited to 10 throughout the first
8 phase of discovery discussed above, and then a more-informed discussion can
9 be had as to the need for how many additional depositions are needed on
10 *Monell* issues.

11 17. With respect to ESI, the parties agree that the collection of materials from ESI
12 repositories that may contain responsive information, and the subsequent use
13 of search terms (including search terms employing Boolean connectors) on
14 collected materials, is generally an appropriate means of identifying
15 responsive ESI. The parties agree to meet and confer in good faith about the
16 ESI repositories to be collected and the search terms to be used in identifying
17 responsive materials. The parties further agree to meet and confer in good
18 faith about the format of and technical specifications for ESI productions as
19 the need to do so arises

20 18. Finally, if it becomes necessary to assert a claim of privilege after privileged
21 documents have been produced, the parties agree to the following procedure
22 and respectfully request the Court include it in its Scheduling Order in this
23 case pursuant to Federal Rule of Evidence 502:

- 24 a. If a producing party discovers that it has inadvertently produced
25 privileged or work-product material, it shall promptly notify the
26 receiving party and ask for the return of such material. The receiving
27 party shall then either return or destroy that inadvertently-disclosed
28 material immediately (including any copies or derivatives thereof). If

1 the receiving party is the first to recognize that material produced in
2 discovery may be privileged or attorney work product, the receiving
3 party shall refrain from any further review of the material, shall notify
4 the producing party as soon as possible of the inadvertent production,
5 shall ask the producing party whether such material should be returned
6 or destroyed, and if so requested by the producing party, shall return or
7 destroy the material. If under either such scenario, however, there is a
8 good-faith argument that the material is not privileged or that the
9 privilege has been waived, the receiving party shall sequester the
10 disputed material and refrain from any further use of it until such time
11 as the claim of waiver is resolved, whether by meet and confer or
12 motion to the Court.

13 19. Fact Discovery Cut-Off: The parties suggest the fact discovery cut-off date be
14 August 14, 2026.

15 20. Expert Discovery Cut-Off: The parties suggest the following timeline for
16 expert discovery:

17 a. Initial Expert Disclosures: August 21, 2026.

18 b. Rebuttal Expert Disclosures: September 25, 2026.

19 21. Settlement Conference: No settlement negotiations have yet occurred. The
20 parties respectfully request referral to panel mediation (ADR Option No. 2),
21 and would agree to panel mediator Richard Copeland.

22 22. Trial Estimate: Given the complex *Monell* issues in this case, the parties
23 expect the trial to last 10-14 days. Plaintiffs expect to collect testimony and
24 evidence relating to San Bernardino and GHRC's policies and widespread
25 practices as they relate to crowding detainees into the enclosed yard at GHRC,
26 past incidents involving detainees overheating, being subject to excessive
27 force, or otherwise getting hurt, ill, or killed at the GHRC, keeping detainees
28 at the GHRC safe (or fail to do so) in the event of medical emergencies,

1 providing medical services to detainees, and the use of force. These topics will
2 require Plaintiffs to depose multiple staff members, including corporate
3 designees, who have information about written policies and unwritten
4 customs within the jail. The trial will be by jury. Plaintiffs cannot realistically
5 estimate the number of witnesses they expect to call at this early stage of
6 litigation, but can update the Court once the parties have completed some
7 discovery.

8 23.Trial Counsel: Plaintiffs will be represented at trial by Sam Harton of
9 Romanucci and Blandin, LLC (admitted pro hac vice), Ben Berkman (pro hac
10 vice pending) and Christian Contreras. Defendants will be represented at trial
11 by attorneys from Cole Huber LLP.

12 24.Independent Expert or Master: The Parties do not believe it is necessary for
13 the Court to appoint a master pursuant to Federal Rule of Civil Procedure 53
14 or an independent scientific expert at the parties' expense.

15 25.Schedule Worksheet: The parties have completed the Court's Worksheet and
16 attach it hereto as Exhibit 1. The parties used the Court's recommended
17 timeline as a guide but made adjustments based on the parties' trial schedules,
18 conflicts, and the expected needs of discovery in this case.

19 26.Class Actions: This is not a class action.

20 27.Other Issues: Plaintiff Anthony Wright is currently being held in the custody
21 of the Riverside County Sheriff. As such, leave of court will be necessary to
22 take his deposition pursuant to Federal Rule of Civil Procedure 30(a)(2)(B).
23 It may also be necessary to obtain orders from the Court to permit Rule 35
24 examinations of Plaintiff while in custody. The parties intend to work
25 together on stipulated requests for the necessary orders in this regard. The
26 parties agree to electronic service of discovery papers, notices, and similar
27 papers by e-mailing such papers to counsel of record.
28

1
2 Dated: September 25, 2025

Romanucci and Blandin, LLC

3 /s/ Sam Harton

4 Sam Harton
Attorney for Plaintiffs,
ANTHONY WRIGHT, *et al.*

5
6 Dated: September 25, 2025

Cole Huber LLP

7 /s/ Daniel S. Roberts

8 Sam Harton
Attorneys for Defendants San Bernardino
County, Shannon Dicus, and James
9 Williams